

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Twana Ahmed, §
§
Plaintiff, § Civil Action No. 4:23-cv-02823
§
v. § The Honorable Lee H. Rosenthal
§
Universal Protection Service, LP, d/b/a § Jury Demand
Allied Universal Security Services, §
§
Defendant. §

**PLAINTIFF TWANA AHMED'S AMENDED PROPOSED QUESTIONS
FOR PLAINTIFF'S COUNSEL'S EXAMINATION OF PROSPECTIVE JURORS**

In light of the Court's instructions about attorney-led voir dire, Mr. Ahmed's attorneys respectfully request a total of 18 minutes for Mr. Ahmed's attorney-led voir dire. This includes (a) 5 minutes per the Court's direction with the questions below more tailored to try and match what the Court wants [addressed in Part 2], and (b) 13 minutes for 3 short questions and venire answers [addressed in Part 1]. The 13-minute piece involves questions meant to help jurors feel more comfortable in the federal courtroom and open up to talk and tell the truth without fear or concern. These questions give all a chance to participate and have a better experience with jury selection, whether or not selected for jury service. And they help all parties learn a lot in a short time about potential jurors.

Part 1: 13 minutes for question and answers

1. What do you think is going to happen now, what kind of questions am I gonna ask you? Here's the deal. If you feel the answer you would give crosses the line and might invade your privacy, will you please let me know? And I'll respect that. I will respect that boundary. I won't pry into that.
2. Our judge has given the lawyers a limited amount of time to ask questions. So, is it okay with you if I do not specifically ask each person each question? Is anyone gonna be offended if I don't get to spend the same amount of time with each you?
3. The next question is about your passion in life. Most people honestly answer the question that their passion is their faith or spirituality, and their family. But with no disrespect to faith or spirituality or family, I'm asking instead: what is your other passion ... if you had no work or other obligations and could do only one thing the entire day?

*Should the Court reject this question about life passion, we request that the Court ask potential jurors about their hobbies or activities that they do for fun.

Part 2: 5 minute questions

4. I've heard that many, many people have negative feelings about trial lawyers. Has anyone ever heard negative things about trial lawyers? Anyone heard things like they lie, they exaggerate?

I get it. I'm not asking for your trust now. You don't know us yet. But I am asking if you will give us a chance to earn your trust. Is there anyone who feels, for whatever reason, that you just can't give us a chance to earn your trust?

5. On a scale of 1 to 10, where 1 is not at all happy, and 10 is incredibly happy, how many of you are generally an 8 or higher on the happiness scale in your life?

6. Picture this: it's 2 a.m. in the dead of night and you come to an intersection where there is a red light. You can clearly see that no one is around. How many of you would still stop and wait for the light to turn green?

7. If any of you read the handbook for jurors on the Court's website, you might remember that the handbook stresses the importance of jurors to our American system of justice. It has been said by judges, and legal scholars, and has been written over the years, that when a jury gets together, to decide matters, they speak for the community, and they are tasked with upholding justice among our fellow citizens.

Now let me ask you a very important question. How many of you are either unwilling or unable, or simply feel like, for whatever reason, you cannot be part of that jury function? Just too heavy a burden?

8. Have any of you been let go from a job before? Do you believe it was unfair?
9. Has anyone you love been let go from a job before? Did that person believe it was unfair?
10. Who feels discrimination in the workplace is worse than it was 20 years ago?
11. Who feels that government is overreaching or micromanaging with workplace discrimination laws?
12. Who has witnessed or faced some form of discrimination in the workplace? For those that have, did you report it to human resources? For those that have faced it personally, who was not happy about the outcome, did not feel they got justice?
13. In general, who believes it is unfair to expect that a company will immediately investigate reports of discrimination?
14. Along those lines, has anyone ever had the chance to sue their employer or former employer, but chose not to move forward with the lawsuit?
15. Suppose you work for a company that distributes most of its rules through a digital link for a handbook that you must sign for. Who will go in and read the whole handbook?
16. Suppose you receive a stack of paperwork that your boss asks you to sign. How many of you will read through all of the paperwork before signing?
17. How many of you have family members, even ancestors, who came to the United States from another country?
18. Does anyone believe that someone should be treated differently in our justice system because they were not born here?
19. There's been a lot of talk recently about immigrants in our country. And I know I've heard that some people feel very negatively about immigrants. Does anyone feel that there might be some truth, even if small, to those negative feelings?

20. Twana Ahmed was born in Iraq. Some people have strong negative feelings about people from Iraq. Does anyone feel that some of those negative feelings might have some truth to them?

21. Who believes it is extremely important that you are not discriminated against because of your race?

22. Who believes it is reasonable for us to expect others will treat us fairly, no matter what our race, national origin, or religion is?

23. Are there any of you that do not believe you deserve to be free from discrimination because of race, national origin, or religion?

24. Does everyone agree that this is a right? To be free from discrimination because of your race, national origin, or religion? Anyone disagree?

25. Would you tolerate it if that right was violated? If you or someone you love was discriminated against at work?

26. Some people believe someone who has experienced illegal discrimination is entitled to recover for the emotional harm that the evidence supports, and other people say no to compensation for emotional harm. How many here say no to any kind of compensation for emotional harm when someone has experienced illegal discrimination?

27. If anyone feels, for any reason, that you perhaps should not serve on this jury, and may be a better fit for a different jury on a different case, please let the marshal know or our judge's staff know, and we can address that more privately.

Respectfully submitted,

/s/ Amanda Hernandez

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